

UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

Accounting of Expert
Witnesses for
Presentencing

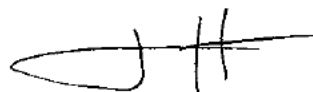
25 July 2013

This filing supplements Appellate Exhibit (AE) 543, the Government's Accounting of Discovery and Expert Witnesses dated 15 May 2013, wherein the United States notified the defense and the Court which witnesses it may qualify as experts, and in what field, during the merits and/or presentencing phase of trial. The United States still may qualify those witnesses who will testify during the presentencing phase of trial as experts in their respective fields. In addition, the United States may qualify the following witnesses as experts in the below fields:

- a. (b) (7)(C). The United States may qualify this witness as an expert in United States Central Command (USCENTCOM) operations from 2010 to 2012;
- b. (b) (7)(C). The United States may qualify this witness as an expert in strategic planning for Department of Defense counterintelligence (CI) and human intelligence (HUMINT), to include strategy, policy development, and functional management;
- c. (b) (7)(C). The United States may qualify this witness as an expert in USCENTCOM strategic planning from 2010 to 2012; and
- d. (b) (7)(C). The United States may qualify this witness as an expert in terrorist activities on the Internet.

Since 15 March 2013, the defense has been on notice of the subject matter of the expected testimony for the above four witnesses. See AE 505. Based on the scope of their expected testimony, the United States has disclosed, or made available to the defense for inspection, those specific facts or data that could reasonably be identified as underlying the opinions of the above witnesses IAW MRE 705. Should the United States learn of additional specific facts or data underlying their opinions during the course of trial preparation, the United States will disclose that material and account for any such disclosure.

The above list does not account for any witnesses the United States may qualify as experts in rebuttal.



J. HUNTER WHYTE
CPT, JA
Assistant Trial Counsel

I certify that I served or caused to be served a true copy of the above on Mr. David Coombs, Civilian Defense Counsel, via electronic mail on 25 July 2013.

A handwritten signature in black ink, consisting of a stylized 'J' followed by 'H' and a horizontal line extending to the right.

J. HUNTER WHYTE
CPT, JA
Assistant Trial Counsel